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May 26, 2022

VIA ECF

The Honorable Mary Kay Vyskocil
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 2230
New York, New York 10007

USDC SDNY
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Re: D'Cunha v. Northwell Health Systems
Civil Case No. 1:22-cv-00988 (MKV)

Dear Judge Vyskocil:

This firm represents Defendant Northwell Health, Inc., incorrectly sued herein as Northwell Health Systems, in the above-referenced action. We write to respectfully request that the Court amend its Scheduling Order (ECF No. 17), which required Defendant to file its motion to dismiss on or before May 31, 2022, and ordered that further briefing be submitted in accordance with Local Civil Rule 6.1(b), and enter the following briefing schedule enlarging the time to file Defendants' fully briefed motion to dismiss the Amended Complaint:

June 7, 2022 (previously May 31, 2022): Filing of Defendant's Moving Papers

June 28, 2022 (previously June 14, 2022): Filing of Plaintiff's Opposition

July 12, 2022 (previously June 21, 2022): Filing of Defendant's Reply Papers

Plaintiff's Counsel consents to this request. Under Local Rule 6.1(b), Defendant's Reply Papers would have been due on June 21, 2022. I will be away on work-related out of State travel from June 16 through June 21, returning on June 22, 2022. My associate, Ms. Wilkens, will similarly be away on work-related out of State travel from June 20 through June 22, returning on June 23, 2022. The additional time will allow us an opportunity to finalize Defendant's moving papers in consultation with our client and adequately prepare reply papers; and provide Plaintiff with additional time to review and draft opposition to our motion. This is Defendant's first request for an enlargement of the briefing schedule.

The Honorable Mary Kay Vyskocil
May 25, 2022
Page 2

Thank you for the Court's time and consideration of this request.

Respectfully submitted,

/s/ Daniel Gomez-Sanchez


Daniel Gomez-Sanchez
Kimberly Wilkens

DGS/mjr

cc: All attorneys of record (via ECF)
4890-3318-1730.2 / 085686-1018

Granted. SO ORDERED.

Date: 5/26/2022
New York, New York


Mary Kay Vyskocil
United States District Judge